



May 30, 2001

Ms. Karen R. Bayly
Florida Department of Environmental Protection
South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

RE: HOWCO Environmental Services
2650-A Edison Ave.
Fort Myers, FL. 33916

Dear Ms. Bayly:

The intent of this correspondence is to confirm that the Tank Farm upgrades at Howco Environmental Services located in Ft. Myers have now been completed.

The concrete containment area was coated with COR-COTE C lining system manufactured by General Polymers and approved by the Department on 05/08/2000; File No. EQ-438.

The interior bottom of each tank and a minimum of 18 inches up the interior walls of each tank were coated with Enviroline 376F Epoxy coating manufactured by Industrial Environmental Coatings Corporation and approved by the Department on 12/17/98; File No. EQ-357.

During the preparation of the tanks prior to coating, the interior surfaces of the tanks were sandblasted to ensure proper adhesion of the lining material. Four drums of the sandblast grit were accumulated and tested for TCLP metals. The results of this testing is attached as Report Number: T012259. All results were less than regulatory levels and this material will be handled through approved Solid Waste handling methods.

The liquids and sludges from tanks 1, 2 and 4 contained used oils and were shipped for recycling to HOWCO's Used Oil Recycling facility in St. Petersburg, FL.

The sludge accumulated from tank 3 was drummed and tested for TCLP metals, volatiles, and semi-volatiles. The results of this testing is attached as Report Numbers: T012026 and T012126. These results show the sludge fails for benzene-2.2 mg/L and for Tetrachloroethene-1.1 mg/L. Nineteen of these drums have been accumulated on-site and will be properly disposed as Hazardous Waste. Per my conversation with Charles Emery on May 29, 2001 it will be acceptable to ship these drums with the existing site EPA ID # FL0001000611.

I want to thank you for your co-operation in accomplishing this project. If you have any additional questions or comments regarding this matter, please feel free to contact me at your earliest convenience. I can be reached at (727) 638-2131.

Sincerely,

David J. Roehm

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JUN 13 2001

D.E.P. - South District

3701 Central Avenue - St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213

Operations: Tampa Bay - Ocala - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467



Advanced
Environmental Laboratories, Inc.

5810-D Breckenridge Parkway
Tampa, Florida 33610
(813) 630-9616
FAX (813) 630-4327

Client: Howco Environmental
3701 Central Ave.
St. Petersburg, FL 33713
Contact: Richard Dillen
Project Name: Howco -Ft. Meyers
Project Number: 25946
Matrix: Solid

Report Number: T012259
Date Reported: 5/4/2001
Date/Time Sampled: 4/26/01@1400
Date/Time Received: 4/27/01@1215
Date Analyzed: 5/3/2001
Analyst: KC

TCLP Metals
Units: mg/l

Analytes(TCLP Limits)	Method	MRL	Lab Code: T012259	T012259-mb
			Sample Name: Sandblast Grit	Method Blank
Arsenic(5.0)	6010B	0.05	U	U
Barium(100)	6010B	0.25	0.91	U
Cadmium(1.0)	6010B	0.025	U	U
Chromium(5.0)	6010B	0.05	U	U
Lead(5.0)	6010B	0.1	U	U
Selenium(1.0)	6010B	0.05	U	U
Silver(5.0)	6010B	0.05	U	U
Mercury(0.20)	7470A	0.002	U	U

MAY 09 2001

Approved by:

Michael L. Cammarata-Lab Manager

Lab ID: E82574
Sample ID: 940242
Not detected above the MRL
RL Method Reporting Limit



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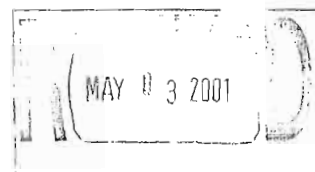
5810-D Breckenridge Parkway
Tampa, Florida 33610
(813) 630-9616
FAX (813) 630-4327

Client: Howco Environmental
3701 Central Ave.
St. Petersburg, FL 33713
Contact: Richard Dillen
Project Name: Tank Cleaning-Howco Ft. Myers
Project Number: 25941
Matrix: HW

Report Number: T012026
Date Reported: 4/27/2001
Date/Time Sampled: 4/12/01@1400
Date/Time Received: 4/17/01@1530
Date Analyzed: 4/24/01-4/25/01
Analyst: KC

TCLP Metals
Units: mg/l

Analytes(TCLP Limits)	Method	MRL	Lab Code:	T012026	T012026-mb
			Sample Name:	Tank 3	Method Blank
Arsenic(5.0)	6010B	0.05		U	U
Barium(100)	6010B	0.25		0.92	U
Cadmium(1.0)	6010B	0.025		U	U
Chromium(5.0)	6010B	0.05		U	U
Lead(5.0)	6010B	0.1		U	U
Selenium(1.0)	6010B	0.05		U	U
Silver(5.0)	6010B	0.05		J3	U
Mercury(0.20)	7470A	0.002		U	U



Approved by: Deanne M. Cammarata
Michael L. Cammarata-Lab Manager

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D.E.P. - South District

Lab ID: E82574
Compqap: 940242
J3 The reported value failed to meet the established QC criteria for either precision or accuracy
U Not detected above the MRL
MRL Method Reporting Limit



Client: Howco Environmental
3701 Central Ave.
St. Petersburg, FL 33713
Contact: Richard Dillen
Project Name: Tank Cleaning-Howco Ft. Myers
Project Number: 25941
Matrix: HW

Report Number: T012126
Date Reported: 4/27/2001
Date/Time Sampled: 4/12/01@1400
Date/Time Received: 4/17/01@1530
Date Analyzed: 4/23/2001
Analyst: KB

TCLP Volatile
EPA Method 5030/8260
Units: mg/L

Analytes	MRL	Lab Code:	T012026	T012026
		Dilution Factor:	1/200	1
		Sample Name:	Tank 3	Method Blank
Benzene	0.1		2.2	U
Carbon Tetrachloride	0.1		U	U
Chlorobenzene	0.1		U	U
Chloroform	0.1		U	U
1,2-Dichloroethane	0.1		U	U
1,1-Dichloroethane	0.1		U	U
Methyl ethyl Ketone	0.4		2.7	U
Tetrachloroethene	0.4		1.1	U
Trichloroethene	0.1		0.036	U
Vinyl Chloride	0.1		U	U

Surrogates	Acceptance Limits	Percent Recovery	Percent Recovery
1,2-Dichloroethane-d4	80-120	80	96
Toluene-d8	88-110	89	98
4-Bromofluorobenzene	86-115	103	95

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Michael L. Cammarata-Lab Manager

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MRL Method Reporting Limit



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3701 Central Ave.
St. Petersburg, FL 33713
Contact: Richard Dillen
Project Name: Tank Cleaning-Howco Ft. Myers
Project Number: 25941
Matrix: HW

Report Number: T012126
Date Reported: 4/27/2001
Date/Time Sampled: 4/12/01@1400
Date/Time Received: 4/17/01@1530
Date Analyzed: 4/25/2001
Analyst: KB

TCLP Semi-Volatiles
EPA Method 1311/8270C
Units: mg/L

Analytes	TCLP Limits	MRL	Lab Code:	T012026	T012026
			Dilution Factor:	10	1
			Sample Name:	Tank 3	Method Blank

Acid Extractables

o-Cresol	200.0	0.25	26	U
m-Cresol	200.0	0.25	39	U
p-Cresol	200.0	0.25	39	U
Pentachlorophenol	100.0	0.25	U	U
2,4,5- Trichlorophenol	400.0	0.25	U	U
2,4,6- Trichlorophenol	2.0	0.25	U	U

Base/Neutrals Extractables

1,4-Dichlorobenzene	7.5	0.1	U	U
2,4-Dinitrotoluene	0.130	0.1	U	U
Hexachlorobenzene	0.130	0.1	U	U
Hexachloro-1,3-butadiene	0.500	0.1	U	U
Hexachloroethane	3.0	0.1	U	U
Nitrobenzene	2.0	0.1	U	U
Pyridine	5.0	0.1	U	U

Surrogates	Acceptance Limits	Percent Recovery	Percent Recovery
2-Fluorophenol	20-119	41	46
Phenol-d6	18-121	53	53
Nitrobenzene-d5	23-120	42	45
2-Fluorobiphenyl	25-121	63	55
2,4,6-Tribromophenyl	15-112	63	35
p-terphenyl-d4	18-137	71	70

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